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May 5, 2023

Honorable Louis L. Stanton
Daniel Patrick Moynihan
United States Courthouse
Courtroom 21C
500 Pearl St.
New York, NY 10007

RE: Jane Doe v. Solebury School and John Ward Regan
Index No.: 21-CV-06792
Our File No.: 21238.00245

Dear Hon. Judge Stanton:

We represent the defendant, Solebury School in the above captioned matter. We write this letter to apprise the Court as to the current state of discovery and to respectfully request a second extension by which to complete depositions.

As per Your Honor's last Order dated March 16, 2023, depositions of all parties and fact witnesses were to be completed by June 19, 2023. As such, all parties have worked in good faith to accommodate the various depositions and currently have both defendants and three fact witnesses scheduled for the remainder of this month. However, in light of the fact that authorizations to obtain plaintiff's medical records from ten medical providers were recently received, we do not yet have any of the necessary records so as to conduct plaintiff's deposition. While we are optimistic that we will receive the requested records within the next thirty days, we acknowledge the possibility this may not be the case. Accordingly, in an abundance of caution and with respect for the Court's time, we ask for an additional sixty days to complete all depositions. Counsel for co-defendant, Regan consents to this request, while counsel for plaintiff has not taken a position.

We thank you in advance for Your Honor's time and attention to this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jennifer A. Robinson'.

Jennifer A. Robinson, Esq.

May 5, 2023

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cc: All Counsel of Record